

# Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

**Applicant:** NASAA Certified Organic Pty. Ltd

**Program:** National Organic Program/Accreditation for Organic Certification

Organizations – 2004 Annual Update

**Location(s):** Desk Audit

**Audit Date(s):** November 30, and December 1, 2004

**Audit File Number:** NP4335DDA

**Action Required:** Yes

**Auditor(s):** Steve Ross

Contact & Title: Lyn Austin, - Director; Bradley Nott - Program Manager

E-mail Address: admin.manager@nasaa.com.au

# **AUDIT ACTIVITIES**

On December 1, 2004 a representative of the USDA, AMS, LS Audit, Review, and Compliance (ARC) Branch completed a review of the annual update documents submitted by NASAA Certified Organic Pty. Ltd. (NASSA); Stirling, South Australia, Australia to verify continued compliance to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP). Bradley Nott, Organic Certification Program Manager submitted requested information on November 20, 2004. Additional information had been requested from the Program Manager during the NOP on-site audit conducted December 14-15, 2004. The requested information as of this date has not been forwarded to the auditor of record.

Bradley Nott was named the new NASSA Program Manager on June 28, 2004. NASSA continues to be a for-profit business. All reviewers and inspectors are contracted employees of NASSA. The final decision is made by the Program Manager. NASSA continues to certify in Australia, Papa New Guinea, Nepal, Sri Lanka and the USA. NASSA continues to be accredited for crops, livestock, processing/handling and wild crops. NASSA continues to be accredited to IFOAM, Guide 65 and AQIS (Australian Quarantine and Inspection Service), an Australian Department of Agriculture Agency. Audit documentation is on review.

ARC Branch Checklist 1025C was used as a basis for determination for compliance to the NOP Rule. Information submitted by NASSA included:

- List of approximately 32 clients certified for crops, livestock, and handling/processor operations,
- Three certification files of each type of operation; Crops, Livestock, and Handling/Processing,
- Performance evaluations of NASSA staff and certification decision makers as outlined in the detailed annual report. No performance evaluations were included for the inspection staff,
- Current conflict of interest disclosure reports for new staff, inspectors, and decision makers,
- Annual program review (Annual Report),
- Training updates,
- Updated policies and procedures, and
- Resumes of new inspectors and certification committee members to be used

Changes to the policies and procedures were minor to bring the program more in compliance with the NOP Rule. Changes to checklists, forms, letters sent to clients were minor in order for NASSA to monitor the organic requirements.

### **FINDINGS**

The result of this review indicates that NASSA Certified Organic Pty. Ltd continues to be in compliance to the National Organic Program Final Rule 7 CFR Part 205. However one minor non-conformance was noted from the annual update supplied by NASSA.

# Non-conformance

**NP4335DDA.NC1** – **Minor** – The NOP Rule section 205.510(a)(4) requires the submission of the results of the most recent performance evaluations ...... *NASSA did not include performance evaluations for the inspectors the company uses for NOP certification audits. The onsite audit requested that these documents be sent to the auditor of record with a timeframe of January 01, 2005. As of this report date the evaluations had not been sent.* 

# RECOMMENDATIONS

This report comes with no recommendations.